

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

18 Cr. 567 (VSB)

CHRISTOPHER COLLINS,  
CAMERON COLLINS, and  
STEPHEN ZARSKY,

Defendants.

**NOTICE OF DEFENDANTS' MOTION FOR THE PRODUCTION OF  
*BRADY* AND RULE 16 MATERIAL  
AND LOCAL RULE 16.1 STATEMENT**

**PLEASE TAKE NOTICE THAT** Christopher Collins, Cameron Collins, and Stephen Zarsky, defendants in the above-captioned action, hereby present this motion seeking an order compelling the production of materials pursuant to *Brady v. Maryland*, 373 U.S. 83 (1963) and Federal Rule of Criminal Procedure 16 (the “Motion”);

**PLEASE TAKE FURTHER NOTICE** that the Motion is made and based on this Notice of Motion, the annexed Memorandum of Law filed concurrently in support hereof, the Declaration of Kendall Wangsgard, Esq., and on such other pleadings, records, oral and documentary evidence and arguments as may be presented to the Court; and

**PLEASE TAKE FURTHER NOTICE** that any opposition to the Motion must be filed on or before March 8, 2019.

**LOCAL RULE 16.1 STATEMENT.** It is hereby certified that the Motion is made following conference of counsel to discuss the relief requested. Counsel for the parties have telephonically met-and-conferred on in good faith to resolve by agreement the issues raised by

the Motion. However, the parties have been unable to reach agreement with respect to the issues raised in the Motion.

Respectfully submitted,

New York, New York  
February 8, 2019

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